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Federal Communications Commission
Office of the Secretary

December 18, 1991

Donna R Searcy, Secretary

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Before the
Federal Communications Commission
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of:
Amendments of Part 97 of the
Commission's Rules Governing
Regarding Repeater and
Auxiliary Operation in the
1.25 Meter Band

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RM-7869

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FCC MAIL BRANCH

To: The Commission

PETITION AGAINST RULE MAKING

I, Thomas L McKernie, N6TM, hereby submit my request to the Federal Communications Commission to NOT take action on this Petition For Rule Making, as submitted by the American Radio Relay League.

As an active amateur on the 1.25 Meter Band, I watched the band grow with a few Amateurs using crystal bound radios, to the extremely dense population of repeaters and other interests on the 1.25 Meter Band. Recently, you reduced our band by 40% due to the recent proceeding of NPRM 87-14.

This new request by the American Radio Relay League, (ARRL), asks that we now take yet another cut into the Amateur spectrum that is still attemptin to relocate those who were displaced in NPRM 87-14. If you accept this petition for rule making, another 17 repeaters in the Southern California area will be displaced. Where will they go? The ARRL says, and I quote "A few may not be able to move, especially in Southern California, and may have to go off the air". I think not! I am a member of a repeater organization that has

invested well over \$17,000 in our system. Does it make sense to you to displace users who currently have equipment on the air, many since the late 1970's? I feel the need of many outweigh the possible use of a very few. The users of the 1.25 meter band were asked how many of the operators were interested about their operating interests. Less than 1% indicated weak signal, SSB, and other experimental operations. You just took away 40% of our Band, and may ask that we continue to erode it away by special interest groups who pressured the ARRL into making this ludicrous petition opposing Amateurs against Amateurs. I can assure you the ARRL does NOT have my interest in mind, and the majority of users will let you know in the this comment period. I have invested heavily into fht 1.25 Meter band, and our clubs stand financial disaster if the petition is adopted. Please bear in mind that a repeater is crystal controlled. Investment in equipment, which is useless in other bands include duplexers, circulators, antennas, additional filters and cavities that are required to allow a quality repeater to filter intermod, and other potential interference associated with operation on a high density mountaintop. A great deal of time and effort has been invested in our repeaters.

Your Report and Order on the matter of 87-14 informed us that the ARRL repeater directory provides the best representation of the Amateur fixed/mobile/repeater operation as noted in section 32, page 5 of the Report and Order, released September 6, 1988. Since the FCC feels the Repeater directory indicates accurate amateur

loading, let me also quote the ARRL Repeater Directory, which is titled "BAND PLAN". It states, "The ARRL supports regional frequency coordination efforts by amateur groups. Band plans are recommendations based on a consensus as to good Amateur operation practice on a nation wide basis. In some cases, however, local conditions may dictate a variation from the national band plan. In these cases, the written determination of the REGIONAL FREQUENCY COORDINATION BODY shall prevail and be considered good amateur operating practice in that region. If the league believes in this theory, then one must ask Why!, are they issuing this petition? I believe no one member of the ARRL board of directors are active on the 1.25 Meter band and should not dictate decisions the area coordination councils should make. We are still suffering from the damage that NPRM 87-14 caused. so intervention again by the FCC in

the 1.25 Meter band will not be taken into consideration against the

NEVER attempted to contact the Southern California 220 Spectrum Management Association to voice their concern. In fact, prior to the league filing this proposal, one member of the frequency board for the 220 Spectrum Management Association contacted one of the league members in support of this proposal, to contact the board to discuss possible options, and their reply was, we will settle for nothing less than 150Khz. With this attitude, it is best to advise the league to work with us, or use the weak signal band on two meters and six meters, where the propagation behaves much like the 1.25 Meter band.

For the above metioned reasons, I repectfully ask the Commission to abondon the proposed allocaton of 222.000 to 22.150 Mhz, to weak signal, and instead defer the matter back to the ARRL for resolution with the local area coordination councils.

Respectfully Submitted,
December 18, 1991

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